

COMPOSITE EXHIBIT “A”

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| | | |
|---|------------------|-----------------------|
| George May Jr | | CHAPTER 13 |
| | <u>Debtor(s)</u> | |
| Deutsche Bank National Trust Company, as Trustee, in trust for registered Holders of Long Beach Mortgage Loan Trust 2006-WL3, Asset-Backed Certificates, Series 2006-WL3 | | NO. 22-10860 AMC |
| | <u>Movant</u> | |
| vs. | | |
| George May Jr | | 11 U.S.C. Section 362 |
| | <u>Debtor(s)</u> | |
| Scott F. Waterman | | |
| | <u>Trustee</u> | |

CONSENT ORDER ON MOTION FOR RELIEF FROM STAY

1. The above-styled Motion having been scheduled for a hearing before the Court on September 7, 2022 upon Notice of Motion to each of the above-captioned parties in interest, and it appearing to the Court that the parties consent hereto:
2. FURTHER IT IS HEREBY ORDERED that the Motion for Relief from Stay is denied, as the parties herein agree that the interest of Movant is adequately protected by payment and performance as more particularly set forth hereinafter.
3. FURTHER ORDERED that as of August 16, 2022, the post-petition arrearage is as follows, pursuant to the terms of the Note, as set forth in the chart below:

| Number of Missed Payments | From | To | Monthly Missed Principal and Interest | Monthly Missed Escrow (if applicable) | Monthly Payment Amount | Total of Monthly Payments Missed |
|--|----------|-------------|---------------------------------------|---------------------------------------|------------------------|----------------------------------|
| 4 | May 2022 | August 2022 | \$467.92 | \$445.25 | \$913.17 | \$3,652.68 |
| Less post-petition partial payments (suspense balance) | | | | | (\$0.00) | |

Total: \$3,652.68

4. This arrearage shall be paid as follows:
 - a. Within seven (7) days of the filing of this Stipulation, Debtor is ordered to pay the total post-petition arrearage totaling a sum **\$3,652.68** by amending the Bankruptcy plan.
5. Regular payments in the amount of **\$913.17** to be paid on or before **September 1, 2022** and any additional amount as required or allowed by the Note and Security Instrument. Payments should be sent to: Select Portfolio Servicing, Inc. Attn: Remittance Processing P.O. Box 65450 Salt Lake City, UT 84165-0450.
6. FURTHER ORDERED that should Debtor(s) default in payment of any sum specified herein, or in any regular monthly mortgage payments which come due according to Movant's Loan Documents, for the life of the bankruptcy then upon notice of default sent by first class mail to Debtor(s), attorney for Debtor(s) and the Trustee, and failure of Debtor(s) to cure such default within **fifteen (15)** days from the date of receipt of such notice, Movant may file a motion and affidavit of default, with service upon Debtor(s), attorney for Debtor(s) and the Trustee, and the Court may enter an Order releasing Movant from the automatic stay, without further notice or hearing.

7. FURTHER ORDERED that in the event relief from the automatic stay is later granted, the Trustee shall cease funding any balance of Movant's claim, and the provisions of Fed. R. Bank. P. 4001(a)(3) may be waived.
8. FURTHER ORDERED that upon completion of any foreclosure sale, any funds in excess of the amount due to Movant and to any subordinate lienholder(s) properly entitled to receive proceeds under applicable State Law that would otherwise be payable to the Debtor(s), shall be paid to the Trustee by the entity receiving the funds from the foreclosure sale for the benefit of the Estate while the Debtor(s) remains in bankruptcy.
9. The parties agree that a facsimile signature shall be considered an original signature

Dated this 17th day of August, 2022

CONSENTED TO BY:

/s/ Rebecca A/ Solarz, Esquire

Rebecca A. Solarz, Esquire

Attorney for Movant



Erik B. Jensen, Esquire

Attorney for Debtor(s)

*/s/ Ann E. Swartz, Esquire for **

Scott F. Waterman, Esquire
Chapter 13 Trustee

Approved by the Court this ___ day of _____, 2022. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge
Ashely M. Chan

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---|------------------|-----------------------|
| George May Jr | | CHAPTER 13 |
| | <u>Debtor(s)</u> | |
| Deutsche Bank National Trust Company, as Trustee, in trust for registered Holders of Long Beach Mortgage Loan Trust 2006-WL3, Asset-Backed Certificates, Series 2006-WL3 | | NO. 22-10860 AMC |
| | <u>Movant</u> | |
| vs. | | |
| George May Jr | | 11 U.S.C. Section 362 |
| | <u>Debtor(s)</u> | |
| Scott F. Waterman | | |
| | <u>Trustee</u> | |

CONSENT ORDER ON MOTION FOR RELIEF FROM STAY

1. The above-styled Motion having been scheduled for a hearing before the Court on September 7, 2022 upon Notice of Motion to each of the above-captioned parties in interest, and it appearing to the Court that the parties consent hereto:
2. FURTHER IT IS HEREBY ORDERED that the Motion for Relief from Stay is denied, as the parties herein agree that the interest of Movant is adequately protected by payment and performance as more particularly set forth hereinafter.
3. FURTHER ORDERED that as of August 16, 2022, the post-petition arrearage is as follows, pursuant to the terms of the Note, as set forth in the chart below:

| Number of Missed Payments | From | To | Monthly Missed Principal and Interest | Monthly Missed Escrow (if applicable) | Monthly Payment Amount | Total of Monthly Payments Missed |
|--|----------|-------------|---------------------------------------|---------------------------------------|------------------------|----------------------------------|
| 4 | May 2022 | August 2022 | \$467.92 | \$445.25 | \$913.17 | \$3,652.68 |
| Less post-petition partial payments (suspense balance) | | | | | (\$0.00) | |

Total: \$3,652.68

4. This arrearage shall be paid as follows:
 - a. Within seven (7) days of the filing of this Stipulation, Debtor is ordered to pay the total post-petition arrearage totaling a sum **\$3,652.68** by amending the Bankruptcy plan.
5. Regular payments in the amount of **\$913.17** to be paid on or before **September 1, 2022** and any additional amount as required or allowed by the Note and Security Instrument. Payments should be sent to: Select Portfolio Servicing, Inc. Attn: Remittance Processing P.O. Box 65450 Salt Lake City, UT 84165-0450.
6. FURTHER ORDERED that should Debtor(s) default in payment of any sum specified herein, or in any regular monthly mortgage payments which come due according to Movant's Loan Documents, for the life of the bankruptcy then upon notice of default sent by first class mail to Debtor(s), attorney for Debtor(s) and the Trustee, and failure of Debtor(s) to cure such default within **fifteen (15)** days from the date of receipt of such notice, Movant may file a motion and affidavit of default, with service upon Debtor(s), attorney for Debtor(s) and the Trustee, and the Court may enter an Order releasing Movant from the automatic stay, without further notice or hearing.

7. FURTHER ORDERED that in the event relief from the automatic stay is later granted, the Trustee shall cease funding any balance of Movant's claim, and the provisions of Fed. R. Bank. P. 4001(a)(3) may be waived.
8. FURTHER ORDERED that upon completion of any foreclosure sale, any funds in excess of the amount due to Movant and to any subordinate lienholder(s) properly entitled to receive proceeds under applicable State Law that would otherwise be payable to the Debtor(s), shall be paid to the Trustee by the entity receiving the funds from the foreclosure sale for the benefit of the Estate while the Debtor(s) remains in bankruptcy.
9. The parties agree that a facsimile signature shall be considered an original signature

Dated this 17th day of August, 2022

CONSENTED TO BY:

/s/ Rebecca A/ Solarz, Esquire

Rebecca A. Solarz, Esquire

Attorney for Movant



Erik B. Jensen, Esquire

Attorney for Debtor(s)

*/s/ Ann E. Swartz, Esquire for **

Scott F. Waterman, Esquire
Chapter 13 Trustee

Approved by the Court this ___ day of _____, 2022. However, the court retains discretion regarding entry of any further order.

Date: August 26, 2022



Bankruptcy Judge
Ashely M. Chan

EXHIBIT “B”



James Robertson, Esquire Everett Anschutz,
Esquire

David J. Schneid, Esquire John Crane, Esquire

Member of Texas Bar

Member of Texas Bar

Member of Florida Bar

Member of Texas Bar

May 9, 2025

George May, Jr.
8022 Lindbergh Blvd
Philadelphia, PA 19153

MICHAEL A. CIBIK
Cibik Law, P.C.
1500 Walnut Street
Suite 900
Philadelphia, PA 19102

VIA EMAIL AND U.S. MAIL

RE: Notice of Default for George May, Jr.; Case No: 22-10860-amc

Dear Sir/Madam,

I represent Deutsche Bank National Trust Company, as Trustee, in trust for registered Holders of Long Beach Mortgage Loan Trust 2006-WL3, Asset-Backed Certificates, Series 2006-WL3 the servicer for mortgage on your client's property located at 8022 Lindbergh Boulevard, Philadelphia, PA 19153. Please consider this letter a Notice of Default under the terms of the Stipulation with respect to the Motion for Relief. (DE 33) ("Stipulation").

According to our client's records, the Debtor has not made the following mortgage payment pursuant to the Stipulation. In accordance with the Stipulation, Deutsche Bank National Trust Company, as Trustee, in trust for registered Holders of Long Beach Mortgage Loan Trust 2006-WL3, Asset-Backed Certificates, Series 2006-WL3, hereby provides notice demanding the default be cured within fifteen (15) days of the date of this notice.

The breakdown of the Debtor's default is as follows:

Payments Due:

| | |
|--|------------|
| Payments Past Due – 04/01/2023 – 05/01/2023 @ \$913.17/month | \$1,826.34 |
| Payments Past Due – 06/01/2023 – 03/01/2024 @ \$787.91/month | \$7,879.10 |
| Payments Past Due – 04/01/2024 – 02/01/2025 @ \$756.86/month | \$8,325.46 |

| | |
|--|--------------------|
| Payments Past Due – 03/01/2025 – 04/01/2025 @ \$757.02/month | \$1,514.04 |
| Suspense Balance | (\$0.22) |
| Total Amount Due to Cure Default: | \$19,544.72 |

The address where payments should be sent is:

**Selene Finance, LP
3501 Olympus Boulevard
Dallas Texas 75019**

Pursuant to the Stipulation, failure to cure this default within fifteen (15) days from the date of this notice will result in Deutsche Bank National Trust Company, as Trustee, in trust for registered Holders of Long Beach Mortgage Loan Trust 2006-WL3, Asset-Backed Certificates, Series 2006-WL3, filing an order terminating the automatic stay.

Please notify me once the payment has been sent, and please provide me with proof of the payment as well. Should you have any further questions, please feel free to contact me.

Sincerely,

/s/ Robert Shearer
Robert Shearer